



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
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ATLANTA GEORGIA 30303-8960

July 25, 2011

Mr. Michael Spaits, Eglin Air Force Base (AFB)
Public Affairs Officer,
101 West D. Avenue, Suite 110
Eglin Air Force Base, Florida 32542-5499

Subject: Availability of Final Environmental Impact Statement (FEIS) for the
Military Family Housing Privatization initiative (MFHPI) at Eglin AFB
and Hurlburt Field, Florida

Dear Mr. Spaits:

Consistent with our responsibilities under Section 309 of the Clean Air Act and Section (102)(2)(c) of the National Environmental Policy Act (NEPA) of 1969, The U.S. Environmental Protection Agency (EPA), Region 4 has reviewed the above FEIS for the proposed MFHPI at Eglin AFB and Hurlburt Field, Florida and are providing the following comments for your consideration.

The FEIS states that:

a. Responsible Agency: U.S. Air Force

b. Cooperating Agencies: None

c. Proposals and Actions: This Final Environmental Impact Statement (FEIS) describes the potential consequences to the human and natural environment from the implementation of various alternatives for implementing the Military Housing Privatization Initiative (MHPI) at Eglin Air Force Base (AFB) and Hurlburt Field, Florida.

☐ Proposed Action – The Air Force proposes to implement MHPI at Eglin AFB and Hurlburt Field through conveyance of all existing housing units (up to 1,413) distributed throughout Eglin AFB and Hurlburt Field, including infrastructure, utility connections, and housing offices, to a private development and property management company. The developer would demolish up to 1,404 dwellings and then construct up to 1,477 new units; up to 35 units for Camp Rudder (for all alternatives except Subalternative 2a), up to 548 units for Hurlburt Field (484 units would be constructed at Hurlburt Field for all alternatives), and up to 929 units for Eglin AFB (depending on the alternative selected). The developer would also return units and associated structures within two

Historic Districts located at Georgia Avenue and Camp Pinchot to the Air Force for purposes other than residential housing (e.g., offices, meeting places) once replacement units are constructed. At completion of the project, a developer would own and operate 1,477 units on behalf of Eglin AFB and Hurlburt Field. The Hurlburt Family Camping facility would also be relocated. All land areas supporting housing would be leased to the developer for 50 years, except for the parcels with historic housing and those returned to the government after demolition, which would be short-term leases.

Alternatives

- Alternative 1 (White Point Area) – Construction of up to 1,477 housing units with 548 units on Hurlburt Field, 35 units at Camp Rudder, and 894 units on Eglin Main Base utilizing a combination of seven parcels within the White Point Area.

- Alternative 2 (Eglin Main Base/Valparaiso Area) – Construction of up to 1,477 housing units with 484 units on Hurlburt Field, 35 units at Camp Rudder, and 958 units on Eglin AFB utilizing one or a combination of 11 parcels located at Eglin Main Base and in Valparaiso.

- Subalternative 2a (Eglin Main Base): Preferred Alternative – Construction of up to 1,477 housing units with 484 units on Hurlburt Field and 993 housing units on Eglin AFB utilizing Parcel 1 on Eglin Main Base and no Valparaiso parcels. No units would be built at Camp Rudder.

- Alternative 3 (North Fort Walton Beach Area) – Construction of up to 1,477 housing units with 484 units on Hurlburt Field, 35 units at Camp Rudder, and 958 units on Eglin AFB utilizing a combination of five parcels within the North Fort Walton Beach Area.

- Alternative 4 (Mix Alternative) – Construction of up to 1,477 housing units on Eglin AFB through utilization of a combination of parcels within any of the areas identified in Alternatives 1–3.

- No Action Alternative – The Air Force would not implement the Proposed Action at Eglin or Hurlburt

Field. Instead, the Air Force would continue to manage/maintain and replace/upgrade military family housing (MFH) in accordance with existing Air Force policy and resources.

The Air Force intends to privatize its housing at Eglin AFB and Hurlburt Field (Figure ES-1) under a statutory program to allow it to meet its military housing requirement. This is referred to as the Military Housing Privatization Initiative, or MPH. This initiative is accomplished by using the National Defense Authorization Act for Fiscal Year (FY) 1996 (Public Law 104-106, 110 St, 186 Section 2801) as amended, which includes a series of authorities that allow the Department of Defense (DoD) to work with the private sector to build and renovate military housing (these authorities were made permanent in FY 2005). The DoD's goal is to obtain private capital to leverage government dollars or land contributions, make efficient use of limited resources, and use a variety of private-sector approaches to build and renovate military housing faster and at a lower cost to American taxpayers. Additional information about housing privatization can be found at: <http://www.acq.osd.mil/housing/legislation.htm>.

At completion of the project, a developer would own and operate 1,477 housing units on behalf of Eglin AFB and Hurlburt Field. The term “housing unit” is defined as a dwelling that accommodates one family. A four-plex would be considered four housing units. All construction and demolition activities would occur on Eglin AFB and Hurlburt Field (Air Force-owned) property. The Air Force would lease the real property underlying the units proposed for demolition to the developer. For areas not designated for rebuilding, this lease would last only until demolition is complete, at which time the developer’s lease would end. For areas designated for rebuilding, the real property parcel would be leased to the developer for a period of 50 years from the date of the transaction. Military family housing (MFH) privatization (10 USC 2871–2885, as amended) is a process wherein the Air Force would receive proposals from interested developers outlining their qualifications and proposals for meeting the development requirements through detailed design and construction, property management, and financial management.

After evaluating all offerors’ proposals, the Government will determine the most advantageous proposal and identify the Highest Ranked Offeror (HRO). The Government will then enter into exclusive negotiations with the HRO to address all of the requirements established in the solicitation documents. At the end of the process, the Air Force will make a source selection decision and, after DoD and Congressional approval of the selection, the lease agreement between the Air Force and the successful developer will be signed.

In addition to providing the required improvements to the housing inventory and neighborhoods, the developer would provide the necessary infrastructure (e.g., roads, utility connections) to support the privatized housing units. The developer would prepare details of specific infrastructure requirements and site plan details for any new privatized housing areas as part of the solicitation process. Even though those details are currently unknown, the analysis of reasonably foreseeable impacts from the project can proceed because the Air Force knows the general locations and construction and demolition activities associated with the proposal. The exact location of each unit within the proposed areas would not significantly alter the outcome of the analysis as long as the developer adheres to all permit/regulatory requirements and Air Force selected mitigations required by the Air Force.

The Air Force will evaluate the selected proposal to determine whether it is within the scope of the analysis presented in this EIS. Should there be potential for impacts from a selected proposal outside the scope of analysis within this EIS, a supplemental analysis may be required.

EIS Process to Date

This document constitutes the fourth iteration of the EIS. The first iteration of the Draft EIS was published and released to the public in April 2005; the Air Force’s Preferred Alternative involved the demolition of the Camp Pinchot Historic District. The Air Force revised the Draft EIS in response to public and agency comments from the initial

public hearing process, changing the Preferred Alternative to allow for adaptive reuse of the Camp Pinchot Historic District, and then released that document to the public as the Revised Draft EIS in April 2006. The Air Force received public and agency comments on that iteration. Before the 2006 EIS was finalized, several circumstances arose that caused the Air Force to halt the finalization of the EIS and reevaluate the Proposed Action.

Base realignment and closure (BRAC) decisions resulted in the planned beddown of the Joint Strike Fighter (JSF) (i.e., the F-35 aircraft), the U.S. Army 7th Special Forces Group (Airborne), and a net of approximately 4,000 additional military, civilian, and contractor personnel (not including family members) at Eglin AFB. Many of the additional personnel will be students. As a result, the Air Force needed to conduct a new housing requirements analysis in light of the changes in personnel. Additionally, rising costs due to recent hurricanes during that period made the utilization of parcels outside the Eglin AFB and Hurlburt Field main base areas (e.g., Camp Pinchot and Poquito Bayou Expansion areas) financially unreasonable. Consequently, the Air Force revised the scope of the MHPI at Eglin AFB and Hurlburt Field to consider these factors. The third iteration of the Draft EIS analyzed the potential consequences from the Proposed Action explained above and in Section 2.1 of that iteration of the EIS. There were no housing alternatives outside the main base areas of Eglin AFB or Hurlburt Field. This was due to a shortfall in project financials associated with hurricane-related increases in construction/insurance costs, as well as reassessment of siting new housing or demolishing historic units at Camp Pinchot due to environmental and historic requirements and public opposition. The total number of housing units was adjusted to reflect the new housing requirements analysis that included changes in personnel associated with the BRAC actions and changes in the local housing market. The Air Force determined that the potential existed for new JSF alternatives introduced during the JSF NEPA process to negatively affect the MHPI Preferred Alternative. Consequently, the Air Force was forced to reevaluate its MHPI concept to identify other housing areas that meet Air Force MHPI housing objectives while those JSF alternatives were examined. In addition, the previous hurricane-related increases in construction/insurance costs started to decline, and previously precluded locations could once again be considered.

This fourth iteration of the EIS describes the changes in the alternative development process, reconsideration of the impacts of current construction costs on alternative feasibility, new alternatives resulting from this process, and the potential impacts to the subsequent affected environment from the MHPI. Table ES-1 provides a summary of the changes in alternatives that are analyzed in this fourth iteration of the MHPI EIS versus the previous three iterations. All alternatives in this iteration include 484 units on Hurlburt Field; up to 35 units at Camp Rudder (except Subalternative 2a); with 958 to 993 units at locations dependent on alternative selection: Alternative 1 – White Point Area (416 acres); Alternative 2 – Eglin Main Base/Valparaiso Area (1,071 acres, including development buffers/setbacks); Subalternative 2a – Eglin Main Base (the Air Force's Preferred Alternative) (673 acres, including development buffers/setbacks); Alternative 3 – North Fort Walton Beach Area (457 acres, including development

buffers/setbacks); and Alternative 4 – Mix Alternative (a mix of parcels from any of the previous alternatives). The entire existing housing project area is shown in Figure ES-1.

Need for the Proposed Action

Need for Privatization

A Quality of Life Task Force report concluded that the continuing decline in the quality of existing on-base military housing, an increase in the out-of-pocket expenses for service members living in private housing, and increased demands on service members and their families (such as more deployments and family separations) could result in potential adverse impacts to military readiness. The uncertainty of the continued availability of traditional funding (including Military Construction [MILCON] and Operations and Maintenance sources) and increasing doubts as to the economic feasibility of this traditional funding forced the Air Force to meet this need by changing its policy. Congress authorized privatization through the National Defense Authorization Act of 1996, which enabled the DoD to rely on private sector housing developers to renovate or demolish existing housing units, build new ones, provide the infrastructure needed to support such developments, and operate, maintain, and manage the housing development on Air-Force owned or project-funded property for up to 50 years.

Need for Housing Units

The Air Force uses the Housing Requirements and Market Analysis (HRMA) to determine the number of families that the local community can accommodate. Where the HRMA reveals the local economy cannot accommodate all the military families assigned to the installation, that installation must then make up the deficit. Determining the specific number of housing units needed at Eglin AFB and Hurlburt Field involved estimating the number of appropriate adequate and affordable private sector housing units available to military families within 20 miles, or a 60-minute commute (whichever is greater). In 2009, Eglin AFB and Hurlburt Field conducted HRMA studies in order to identify housing units available to military members in the private community. The Air Force factored shortfalls in available private sector housing into the total MFH requirement for Eglin AFB and Hurlburt Field to determine the number of units needed to support its military families. Cumulatively, the Air Force determined that the Eglin AFB and Hurlburt Field FY 2014 housing requirement is 1,477 units. This total does not include the 300 Section 801 leased housing units at Commando Village, located just east of Hurlburt Field on Martin Luther King Boulevard in Fort Walton Beach, Florida. Since the Air Force does not own the 300 Commando Village homes, they are not included in the Proposed Action or alternatives evaluated in this EIS. The lease for the Commando Village homes expires in June 2012, at which time the homes would be considered local market rental units.

Need for Land Area to Support Housing

Unique aspects of the military mission mandate features in military housing neighborhoods that may not be of equally great importance to civilian housing residents. For instance, due to the nature of the military mission, whether for exercises or real-world incidents, a high percentage of the military workforce must be able to arrive at their duty stations with little notice, while for most civilians it is an expediency to be located near their places of employment.

The *Air Force Family Housing Guide* balances these concerns with the concerns shared by non-military residents, such as noise and traffic avoidance, convenience, aesthetics, and price. Accordingly, it requires the installation to consider all these concerns when arriving at a decision on the housing density and location, and primary among these (as it would be for a civilian landowner) is the ability of the available land to satisfy these concerns. Initially, during the first two iterations of the EIS, the Air Force evaluated the entire Eglin AFB Reservation for housing locations based on a set of housing objectives. These objectives were essential for the MHPI in that the objectives had to be met in order for a particular site to be carried forward for consideration as a potential development location. However, changes in scope under the third (previous) iteration of the EIS required the Air Force to locate housing units within the main base boundaries for financial reasons. As a result, many of the initial objectives, while still met, were no longer applicable to identifying potential housing areas on Hurlburt Field and Eglin AFB main bases and were not deciding factors in identifying potential locations. As an example, since the scope of the project had changed at that time to development within the main base boundaries, such objectives as a “60-minute commute time” were no longer applicable to housing area identification. However, the new scope for the 2010 EIS (the fourth iteration) requires the Air Force to reevaluate the entire Eglin Reservation because potential JSF alternatives may conflict with certain MHPI objectives. As a result, the Air Force has modified slightly the initial objectives and applied them to the entire reservation to identify potential development areas. The following narrative provides a summary of the evaluation process of potential development locations used in this EIS iteration.”

EPA COMMENTS TO FEIS

1. The EPA comments made to the 2005 DEIS, 2006 DEIS, 2008 DEIS and 2010DEIS still apply to the scope of work to be done under this 2011 FEIS. For easy reference and compliance with those comments they are attached and made part of our comments to this FEIS review as attachment number 1.
2. The FEIS should include Time Schedule showing proposed start and finish dates for each project task.
3. EPA recommends the Air Force monitors the contractor closely during construction to ensure compliance with the implementation of all of these permitting and regulatory requirements.

4. Air Force should ensure the public is well informed at all times through frequent meetings, flyers, announcements and public hearings to secure their support and input for the project.
5. Recycling should be done according to DoD 4160.21-M/chapter 7 RESOURCE RECOVERY AND RECYCLING PROGRAM (RRRP) which states: All installations, worldwide, shall have recycling programs as required by Executive Order 12780. Pursuant to Public Law 97-214 (10 USC 2577), and DoD Instruction (DoDI) 4715.4, Pollution Prevention.
6. Commitments for use of BMP, elements of Green Building techniques, recycling of materials, disposal of federal property per federal regulations for disposal of federal property and etc., should be documented in the ROD.
7. Attachment Number 2 is a check list of items that could help facilitate your compliance with the NEPA and cross-cutters regulations.
7. Other links that could be beneficial to the project include:

Waste Reduction Resource Center - hosted by North Carolina but it is an EPA Region 4 resource - <http://wrrc.p2pays.org/>

Industrial materials - <http://www.epa.gov/osw/consERVE/rrr/imr/index.htm>

http://www.fema.gov/plan/prevent/fhm/dl_zone.shtm

C&D - [http://www.epa.gov/osw/consERVE/rrr/imr/cdm/
www.epa.gov/nscep/](http://www.epa.gov/osw/consERVE/rrr/imr/cdm/www.epa.gov/nscep/)

<http://www.pavementpreservation.org/toolbox/links/arrafull.pdf>

<http://www.secement.org/fdr.htm>

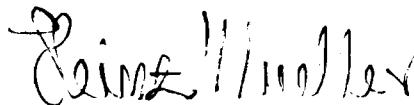
http://www.cement.org/pavements/pv_sc_fdr.asp

<http://www.techtransfer.berkeley.edu/newsletter/04-2/refs.php>

<http://www.youtube.com/watch?v=s7w7gsFYNzA>

The EPA supports your projects and we thank you for the opportunity to provide comments for your consideration. Should you have questions regarding our comments, please contact Rafael Santamaria at (404) 562-8376 or at santamaria.rafael@epa.gov of my staff.

Sincerely,



Heinz Mueller, Chief
NEPA Program Office

Attachment

ATTACHMENT NUMBER 1

March 2, 2011 EPA COMMENTS

The EPA comments made to the 2005 DEIS, 2006 DEIS and the 2008 DEIS still apply to the scope of work for this 4th 2010 DEIS revision.

1. Ensure Federal Regulations that establish requirements during renovation, repair and painting activities that disturb lead-based paint is followed.
2. Ensure all projects repairs and rehabilitation should comply with the FEMA regulations and guidelines.
3. Ensure Federal regulations are observed before spending money in flood plain locations
4. Ensure owners can afford the flood insurance after the property is rehabilitated.
5. Ensure the project complies with local, state and federal asbestos requirements.
6. The Green Buildings category - Many activities at construction sites can impact air quality, including operation of diesel engines, open burning, land clearing, and demolition. Air pollution rules applicable to constructions sites are contained in federal, state and local regulations and ordinances. These rules must be followed during construction.
7. Permits information - Contact the appropriate Federal, State, County or City officials regarding permits and local ordinances.
8. Open Burning - The burning of materials for waste disposal purposes is referred to as open burning. Open burning permits and/or specific federal, state and local standards must be followed.
9. THE CONSTRUCTION INDUSTRY COMPLIANCE ASSISTANCE CENTER (CICA CENTER) cicacenter.org is your source for plain language explanations of environmental rules for the construction industry. This information is provided free of charge by the National Center for Manufacturing Sciences. Funding for this project has been provided by the U.S. Environmental Protection Agency.

September 22, 2008 EPA COMMENTS

The EPA comments made to the 2005 (Attachment # 1) and 2006 (Attachment #2) Draft EIS's still apply to the scope of work from the 2005 and 2006 DEIs that remain in this third 2008 DEIS revision. Attached you will find an electronic copy of the May 23, 2005 comments letter (Attachment # 1) and the June 2006 comments letter (Attachment # 2).

1. Page 2-28, Section 2.4.1 "No Action Alternative", Line 11. This Supplemental DEIS addresses a narrow portion of the changes that will occur at Eglin over the next several years. The BRAC recommendations, for example, will bring thousands of new people to the area. Will the housing plans discussed in this supplemental DEIS be adequate for the changes in population that will occur as a result of BRAC and other upcoming actions?
2. Page 3-4, Section 3.1.2 Lines 7 to 10 should read "Widening SR-85 to six lanes from 12th Avenue to SR-189" to Widening SR-85 from a specific number of lanes to six lanes from 12th Avenue to SR-189.

3. Page 3-10, Section 3.1.2, Line 26 should update job growth comparison made between 2001, 2005 and 2007 to include the current 2008 job market.
4. Page 3-27, Section 3.4.3, Line 17 explanation should be included justifying why the analysis did not address air quality issues associated with operational activities at Eglin AFB after the completion of construction.
5. Page 3-28, Section 3.5.2, Line 12 the DEIS should include in the appendix a copy of the AFOSH. The appendix should also include comments made by agencies that offered comments on the DEIS.
6. Page 3-31, Section 3.6.2, Line 4 EPA recommends the Air Force makes ensure the developer handle and dispose all hazardous materials properly and disposed in licensed sanitary landfills, that hazardous material are handled and disposed according to local, state, federal rules, regulations and guidelines; the Clean Water Act (to include RCRA and CERCLA requirements).
7. Page 3-32, Section 3.6.2, Line 6 the Air Force should handle these USTs according to the State and Federal rules regulations and guidelines. The FEIS should address the issue of removing or not removing them and should include state and federal documentation concurring/not concurring with the final Air Force decision.
8. Page 3-42, Section 3.7.2, Line 18 the Air Force should ensure the BRAC EIS addresses the F-35 noise issue. The Air Force should require the housing contractors to use noise abatement materials in housing located in areas exposed to over 65dBA so that the noise in the housing is maintained under the 65dBA.
9. Page 3-60, Section 3.10.2, Line 32 since an archaeological survey has not being completed in Parcel D2 the results of the survey should be included in the Final EIS.
10. Page 3-86, Section 3.11.3, Line 28 the Air Force must ensure developers obtain and comply with the components of the permits.
11. Page 3-87, Section 3.12.1, Line 20 EPA defers to the U.S. Fish and Wildlife (USFWS) to comment on threatened and endangered and sensitive species (TES). However, the Air Force should consider using the EPA points system to keep abreast of new endangered species in the area. The endangered species mentioned are the eastern indigo snake and the golfer tortoise more listing of precautions should be added to ensure the animals safety.
12. Page 4-11, Section 4.1.3, Table 4-6, Peak Hour Trips, the "AM Exiting" numbers, appear not to be correct.
13. Page 4-28, Section 4.4.1, Line 29 this DEIS should include what type or types of facilities the Air Force wants to have constructed so that air quality issues associated with this construction and demolition can be somewhat identified before the work is done so that air pollution standards and permits are not violated.
14. The EPA recommends that since soil disturbance associated with the construction and demolition could generate considerable amounts of erosion and environmental harm, the Air Force should require and monitor the contractors to apply stringent controls to minimize potential adverse impacts on groundwater and surface water. The FEIS should require that the contractors do the work according to the local and State of Florida erosion and sediment rules and guidelines; the Clean Water Act; the required state and COE permits and the Executive Order 11988 - Flood Plain Management and the and EO 11990 - Protection of Wetlands. Runoff controls should be updated periodically for the

- duration of the construction (e.g., every 2-3 months) and maintained to help ensure success (e.g., silt fences emptied and hay bales replaced).
15. Page 5-4, Section 5.2.4, Line 19 Only limited mitigation activities are discussed in the section. The Air Force should consider actions that can avoid air quality impacts including, but not limited to:
 - a. A ban on open burning – all materials that might otherwise be burned should be recycled to the extent feasible to avoid health and visibility impacts.
 - b. Minimizing dust and debris generated during demolition and construction. What measures are planned for dust suppression?
 - c. Construction limited to the smallest footprint feasible to avoid environmental degradation and reduce the amount of dust generated during construction.
 - d. Maintenance of the maximum amount of trees feasible within the project area during construction to reduce footprint, noise and dust dispersion during construction.
 - e. Installation of the latest air pollution control devices on all construction equipment (see EPA's Verified Technologies List for diesel engines at <http://www.epa.gov/otaq/retrofit/verif-list.htm>).
 - f. Use of ultra low sulfur fuel exclusively for construction equipment.
 - g. Restriction on the time that engines involved in construction may be left to idle. In order to minimize future emissions, the Air Force might consider instituting a shuttle service, to serve the various areas of Eglin Air Force Base and Hurlburt Field, thereby reducing the need for many single vehicle short trips.
 17. Page 6-9, Section 6.3.9, Line 21 the Air Force should not assume but should require the developer to use noise abatement materials in housing located in areas exposed to over 65dBA so that the noise in the housing is maintained under the 65dBA.
 18. The EPA suggests the recommendations made by **Green Building** to be followed whenever possible. **Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition.** Research and experience increasingly demonstrate that when buildings are designed and operated with their lifecycle impacts in mind, they can provide great environmental, economic, and social benefits. **Elements of Green Building** includes:
 - Smart Growth and Sustainable Development
 - Energy Efficiency and Renewable Energy
 - Water Stewardship
 - Environmentally Preferable Building Materials and Specifications
 - Waste Reduction
 - Toxics
 - Indoor Environments
 You can find more EPA information on **Green Building** at www.epa.gov/greenbuilding
 19. Enclosed you will find a generic check list of items that could help facilitate your compliance with the NEPA regulations (Attachment # 3).
 The EPA supports your project. However before we can concur with the FEIS the above comments need to be addressed. Based on these comments, the EPA rates your DEIS document as EC-2 that is; we have environmental concerns about aspects of its implementation and request that the identified information, data, analyses, or discussion be included in the FEIS.

June 2, 2006 EPA COMMENTS

Page ES-4, Line 33

The Air Force Preferred Alternative #6 calls for adaptive reuse of Camp Pinchot Historic District. Therefore this sentence should be reworded and the word “demolished” should be left out in this part of the FEIS and in all other parts throughout the FEIS where this demolition is found in reference to Camp Pinchot, Alternative #6. Any demolition should be done according to FLSHPO and the National Historic Preservation Act (NHPA) rules, regulations and guidelines.

Page ES -7, Line 24

“Adaptive reuse” should be defined at this point or cross-referenced with the definition shown on page 4-3, Line 28.

Page ES-13, Line 1,

The RDEIS state that: “The Air Force does not anticipate impacts to traditional American Indian resources under any of the alternatives.”

This sentence should be cross-referenced with the write up place in the FEIS where comments from Native American Indians Organizations and or Tribes were requested by the Air Force and what comments were received from them.

Page ES-17, Line 21

The RDEIS states that: “Once the logistic details of BRAC are better defined, the Air Force would address the cumulative nature of BRAC actions in regard to other actions in the region, including this action, in BRAC NEPA documentation.”

EPA recommends that the Air Force should make sure to address in the FEIS these cumulative actions once the logistic details of BRAC are better defined. The FEIS should discuss the efforts the Air Force is making to obtain and better define the logistic details of BRAC in reference to the cumulative actions affecting this region. If a supplemental FEIS is needed to address the many unknown issues related to this project, and that would possibly affect it, EPA strongly recommends it should be done.

Page ES – 18, Line 39

The RDEIS states that: “The developer would handle and dispose of all hazardous materials in accordance with applicable laws, regulations, and Air Force Instructions.”

EPA recommends the Air Force to ensure the developer handle and dispose all hazardous materials properly and disposed in licensed sanitary landfills, that hazardous material are handled

and disposed according to local, state, federal rules, regulations and guidelines; the Clean Water Act (to include RCRA and CERCLA requirements).

Page ES-19, Line 2

The RDEIS states that: “In most cases archaeological sites can be avoided. However, in the event that the developer cannot avoid these sites, the Air Force or developer would implement mitigations developed during the NHPA consultation process.”

EPA recommends the Air Force monitor the contractor to ensure compliance with the implementation of mitigations if developer cannot avoid these archaeological sites.

Page ES-20, Line 24 - Permitting and Regulatory Requirements

EPA recommends the Air Force monitors the contractor to ensure compliance with the implementation of all of these permitting and regulatory requirements. Disposal of federal property should be done according to federal regulations for disposal of federal property.

Page 1-1, Line 19

EPA recommends Figures 1-1, 2-1 and 2-19 should be bounded together in the FEIS document.

Line 30

EPA recommends the “adaptive reuse” terminology be cross referenced to with the definition found on Page 4-3, Line 26.

Lines 33 to 37

EPA recommends this paragraph be rewritten in the FEIS, i.e., the Air Force has already made the decision that “the preferred alternative” is Alternative Number 6 and in this alternative Camp Pinchot is not going to be demolished.

Line 19

EPA recommends Figures 1-1, 2-1 and 2-19 should be bounded together in the FEIS document

Page 1-9, Line 1

Since the Air Force had a change in Preferred alternative, it would be very beneficial to ensure the public is well informed at all times through frequent meetings, flyers, announcements and public hearings to secure their support and input for the project as shown on Page 2-17, Line 28. In addition, if the Air Force needed to make additional changes and/or adjustments of any kind during construction, they could be made in a timely manner at a little or no cost and with better environmental results.

Page 2-18, Line 17

EPA recommends the FEIS include the number of acres of wetlands involved in the expansion.

Page 2-27, Line 21

EPA recommends the Air Force require the contractor protect any archaeological sites according to the NHPA and also the FLSHPO rules, regulations and guidelines.

Page 2-31, Alternative 6

EPA recommends that since Alternative 6 is the “Preferred Alternative”, it should be individually evaluated, i.e., without reference to the impacts attendant to other alternatives.

Page 2-35, Biological Resources, Line 11

The RDEIS states: “Coordination with Eglin’s Natural Resources Branch for additional surveys to ensure no sensitive species are in the area at the time of project initiation would be required.”

EPA recommends that the Air Force conduct these additional surveys before project initiation.

Page 2-47, Line 1 - Soil Runoff

The EPA recommends that since soil disturbance associated with the construction could generate considerable amounts of erosion and environmental harm, the Air Force should require and monitor the contractor to apply stringent controls to minimize potential adverse impacts on groundwater and surface water. The FEIS should require that the contractor do the work according to the local and State of Florida erosion and sediment rules and guidelines; the Clean Water Act; the required state and COE permits and the Executive Order 11988 - Flood Plain Management and the and EO 11990 - Protection of Wetlands. Runoff controls should be updated periodically for the duration of the construction (e.g., every 2-3 months) and maintained to help ensure success (e.g., silt fences emptied and hay bales replaced).

Page 2-51 – Hazardous Materials/Waste, Line 18

The RDEIS states: “Consequently, asbestos surveys must be performed on buildings (that have not already undergone survey) prior to renovation/demolition.”

EPA recommends that the Air Force ensure the necessary additional asbestos surveys are conducted prior to renovation/demolition and/or before project initiation.

Line 37

In addition to the detailed hazardous waste handling procedures outlined in Section 2.7.10.2 Management Actions, EPA recommends the Air Force should ensure the solid waste debris, solid wastes, chemicals and hazardous materials be properly handled by licensed contractors and

disposed in licensed sanitary landfills according to the type of waste; that chemicals and hazardous material be disposed of according to local, state, Federal and Clean Water Act (including RCRA and CERCLA) rules, regulations, guidelines and requirements.

Page 2-53, Line 2

In addition to the listed BMPs to minimize potential noise issues, the EPA recommends that contractors be encouraged to operate and maintain all equipment according to manufacturer's specifications and recommendations.

Page 3-21, Environmental Justice (EJ)

The FEIS should discuss in detail if there were any EJ community involvement, follow-up analyses, and/or outreach efforts performed. Also, what impact will the project have on minority businesses?

Page 3-30, Line 14 - Identify with Cultural Resources

EPA Recommends the Air Force continue to work diligently with NHPA, FLSHPO, ACHP and American Indian Tribes/organizations (including consultation with the Native American Graves and Repatriation Act – NAGPRA) to identify National Register-eligible archaeological sites and to ensure the extensive cultural resource surveys and further evaluations are carried out in order to minimize the adverse impacts to historic properties in the project areas.

Line 30

The initials CEVH should be listed in the List of Acronyms, Abbreviations, and Symbols

Page 3-37, Line 20

The RDEIS states that: "In the event burials are located during future ground-disturbing activities, procedures for unexpected discoveries would be followed." The EPA recommends the Air Force should monitor the contractor to ensure compliance with this statement.

Line 37

EPA recommends that since prehistoric archaeological site 8OK168 testing and evaluation determined that the site was ineligible for listing on the National Register. The FEIS should make reference to the place where the testing and evaluation information is found.

Page 3-38, Line 2

The initials NAGPRA should be listed in the List of Acronyms, Abbreviations, and Symbols

Page 3-48, Line 24

The EPA notices the **RDEIS** states: “A **threatened** species is any species that is **likely** to become endangered within the foreseeable future throughout all or a significant portion of its range. Eglin has developed an overall goal within the Integrated Natural Resources Management Plan to continue to protect and maintain populations of native threatened and endangered plant and animal species within the guidelines of ecosystem management (U.S. Air Force, 2002).” This is a proactive approach to protect sensitive species and to comply with the law and the Air Force is to be commended. The FEIS should include portions of this Integrated Natural Resources Management Plan and reference should be made as to where or how it could be accessed.

Page 3-58, Line 6 – Wetlands

EPA recommends the Air Force protect wetlands, groundwater, bays, aquifers, bayous, creeks/rivers, lakes, sounds and etc., water quality per State of Florida and Federal laws and regulations, the Clean Water Act and EO 11990 - Protection of Wetlands and EO 11988 - Flood Plain Management from the pollution associated with this project’s demolition and construction.

Page 3-61, Line 9 Soils

The EPA recommends that since soil disturbance associated with the construction and demolition could generate considerable amounts of erosion and environmental harm, the Air Force should require and monitor the contractor to apply stringent controls to minimize potential adverse impacts on groundwater and surface water. The FEIS should require that the contractor do the work according to the local and State of Florida erosion and sediment rules and guidelines; the Clean Water Act; the required state and COE permits and the Executive Order 11988 - Flood Plain Management and the and EO 11990 - Protection of Wetlands. Runoff controls should be updated periodically for the duration of the construction (e.g., every 2-3 months) and maintained to help ensure success (e.g., silt fences emptied and hay bales replaced).

Page 3-68, Line 9 – Hazardous Materials/Waste

In addition to the detailed hazardous waste handling procedures outlined in Section 2.7.10.2 Management Actions, and Section 3.10 Hazardous Materials/Waste, EPA recommends the Air Force should ensure the solid waste debris, solid wastes, chemicals and hazardous materials be properly handled by licensed contractors and disposed in licensed sanitary landfills; that chemicals and hazardous material be disposed of according to local, state, Federal and Clean Water Act (including RCRA and CERCLA) rules, regulations, guidelines and requirements.

Page 3-69, Line 33

The initials CEG/CEVC, CES/CEV should be listed in the List of Acronyms, Abbreviations, and Symbols.

Page 3-77, Line 19

The Air Force should ensure that the construction and demolition debris from the MFH be properly handled by licensed contractors and disposed in licensed sanitary landfills for each type of debris.

Page 3-80, Line 28

The RDEIS states that: “A comprehensive characterization of surface vehicle traffic noise for roadways within the area of influence has not been accomplished.” The FEIS should explain in detail **why** this noise characterization **is not** necessary.

Page 3-81, Line 13

The RDEIS states that: “Noise for the NSC has not been modeled though it is used extensively by aircraft traveling to and from Eglin, and by commercial aircraft (U.S. Air Force, 2003c).” The FEIS should explain **why** NSC noise has not been modeled.

Page 4-2, Line 2

The DREIS states that: “...specific mitigation measures associated with these permits and regulations are unknown at this time as they are dependent on the ultimate project design approved by the Air Force and the associated permit requirements mandated by the associated regulatory agencies.”

EPA recommends the Air Force include in the FEIS as many of the specific mitigated measures as possible along with documentation showing the efforts made by the Air Force to obtain them from the regulatory agencies. The Air Force should include in the FEIS a list of specific mitigated measures that could be obtained at a later date and approximately when those specific mitigated measures will be obtained and when will they be implemented.

Page 4-2, Line 32

If the BMPs would further offset or minimize potential impacts on the environment, EPA recommends, they should be required and implemented by the Air Force.

Page 474, Line 2

The RDEIS states that:

“Wetlands

No construction and demolition activities would occur within wetland areas under any alternative. As a result, there would be no direct impacts to wetlands. Indirect impacts, such as erosion and sediment transport into wetland areas associated with demolition activities, would be

minimal given the implementation of management actions and mitigations and BMPs associated with permitting requirements.

For construction activities, maintenance of a 50-foot buffer from any adjacent wetlands or surface waters would result in no permitting issues with the USACE and FDEP. Studies show that this buffer would help control erosion and protect water resources from neighboring land uses and nutrient inputs such as fertilizers, leaking sewage lines and animal waste (Wenger, 1999).

Floodplains

Portions of the Sound side Manor location currently reside within a 100-year floodplain. Demolition of 1 unit would occur within the floodplain but no new construction would occur. Demolition activities in this area would not result in the alteration of the existing condition of the floodplain as this area is currently a residential area. The Air Force does not anticipate adverse impacts to the existing baseline functionality or utility of the floodplain in this area. The developer would not fill, alter, or construct in floodplains in any of the other project areas or alternative locations."

The EPA recommends that the Air Force should monitor and ensure the contractor uses methods with the least environmental adverse impacts on groundwater, streams, lakes, bays, bayous, sounds, wetlands and flood plains associated with the housing demolition, land clearing, construction, and operations, as well as boat dock construction and operations on the various (Not counting wetlands) sites that cover approximately 860 acres. The FEA should state that the work should be done according to the local, State of Florida erosion and sediment rules and guidelines; the Clean Water Act; the required state and COE permits and the Executive Orders 11988 - Floodplain Management and EO 11990 - Protection of Wetlands. Runoff controls should be updated periodically for the duration of the construction (e.g., every 2-3 months) and maintained to help ensure success (e.g., silt fences emptied and hay bales replaced).

Page 4-88, Line 28

The Air Force should handle these ASTs and USTs according to the State and Federal rules regulations and guidelines. The FEIS should address the issue of removing or not removing them and should include state and federal documentation concurring/not concurring with the final Air Force decision.

Page 5-12, Line 1

EPA recommends The FEIS should include the latest cumulative impacts (total impacts including direct and indirect impacts) analysis as they affect the air quality in the area due to the size and nature of the project including the emissions associated with BRAC.

In addition, EPA recommends that the contractors be encouraged to maintain and operate all construction equipment per manufacturer's specifications and recommendations to minimize air emissions. The Air Force should also consider offering an incentive for contractors to specify

the use of retrofitted diesel equipment or purchase of available ultra-low diesel fuel in their bids. The FEA should address the impact of the construction on the air quality if some or all of the construction could be done at night.

Page 5-12, Line 20

The comments made above on Page ES-17, Line 21 also apply to this portion of the RDEIS. Page 5-13 Line 17. In addition to the listed BMPs to minimize potential noise issues, the EPA recommends the Air Force that during construction, noise impacts, could be minimized by limiting any unnecessary noise during construction and by encouraging contractors to operate and maintain all equipment according to manufacturer's specifications and recommendations.

The EPA supports your project. However before we can concur with the FEIS the above comments need to be addressed. Based on these comments, the EPA rates your RDEIS document as EC-2 that is; we have environmental concerns about aspects of its implementation and request that the identified information, data, analyses, or discussion be included in the FEIS.

May 23, 2005 EPA COMMENTS

We have identified a number of concerns with this report and recommend that the Air Force address these issues in the final EIS document. Our concerns and recommendations are listed below.

1 The DEIS presents a total of seven alternatives, including a No Action Alternative. The number of alternatives are excessive and confusing. Please simplify to three or four alternatives at most, including the no action alternative. In addition, the characterization of potential environmental and human health impacts, and proposed actions to avoid, minimize and/or mitigate these impacts within each alternative should be complete. Doing so will result in improved project planning, reduced construction costs and foster acceptability among interested parties.

2 Elgin Air Force Base must comply with new NPDES Phase II requirements yet little, if any, required best management practices are included in this report. For example, post-development stormwater runoff must be controlled both in terms of quantity and quality. How will this project adequately address this new requirement? What guidelines will be used to determine appropriate stormwater management control devices for these sites? Who will be responsible for maintaining the stormwater infrastructure? Who will conduct inspections during and after construction to determine if the structures are performing appropriately? Who and how will enforcement of the new regulations take place?

3 The document does not adequately define sensitive areas and species and so is limited in its ability to ensure unacceptable impacts will not occur. Authors state that if sensitive areas are not adequately avoided and/or if new species become listed as endangered, the Air Force will address the necessity for supplemental environmental documentation consistent with NEPA. The DEIS indicates that all alternatives except alternative 2 will have great potential to impact biological resources due to the extensive amount of land proposed to be cleared. Given this fact, a comprehensive assessment of environmental resources should be completed and significant results included in the development and evaluation of proposed alternatives in the FEIS.

4 The DEIS does not address details of the proposed locations and construction of the structures leaving these and other significant items to the developer yet to be identified. We recommend that these important issues be addressed to a greater extent by the Air Force prior to selection of a developer. This is important for many reasons, one being the developer to be selected must demonstrate experience and expertise in building sustainable military housing. We also recommend that the Air Force and chosen developer utilize “smart growth” concepts in the design and construction of new housing. Smart growth concepts, such as conservation subdivisions and compact building design, facilitate preservation of open space and critical environmental areas as well as improved stormwater management and an enhanced quality of life for military families living both on and off base.

5 Residents living adjacent to the military base have expressed concern that the military’s proposed multi-family will be inconsistent with the current zoning regulations and housing types. The document does not address how these concerns will be adequately addressed. EPA recommends that Air Force representatives work with the local government and citizens to ensure that future development on the base is consistent with the local comprehensive plan and adequately addresses the issues raised by nearby residents.

6 Finally, the demolition of historic structures is a concern to EPA and should be avoided. The document states that alternative 2 is the only alternative resulting in no impacts to cultural resources, and that alternatives 3 and 5 (the preferred alternative) result in the greatest impact to cultural resources. We recognize that the document states that close coordination with the Florida SHPO will take place and so we defer to this Agency with the hope that historical structures and archeological artifacts will be preserved to the greatest extent possible.

In summary, we support the proposed project but request additional information and clarification on the above issues before we can concur with the final Environmental Impact Statement (EIS) for Housing Upgrades at Eglin Air Force Base and Hurlburt Field, Florida. Therefore, we rate the DEIS document as **EC-2** (environmental concerns with insufficient information provided).

ATTACHMENT NUMBER 2

ENVIRONMENTAL PROTECTION AGENCY REGION 4 NEPA CHECK LIST

Consistent with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA), Region 4 offers the following general comments/suggestions for your consideration/inclusion that could help facilitate your compliance with the NEPA regulations in this project and in future Draft Environmental Impact Statement (DEIS), Draft Environmental Assessment (DEA) and/or Final Environmental Impact Statement (FEIS) for the **Availability of Final Environmental Impact Statement (FEIS) for the Military Family Housing Privatization initiative (MFHPI) at Eglin AFB and Hurlburt Field, Florida:**

1. DEA development must be consistent with Section 309 of the Clean Air Act
2. Should include clear conclusions why the Preferred Alternative was selected. The "Preferred Alternative" should be individually evaluated, i.e., without solely referencing to the impacts attendant to other alternatives.
3. The DEA should have a complete list of abbreviations, definitions, acronyms and symbols
4. Similar subjects/terminologies should be cross-referenced with like definition shown/found on other document's pages.
5. The DEA should be specific and describe what facilities or portions of the facilities will be demolished and when. Any deconstruction (demolition) should be done according to the state Historic Preservation Officer (SHPO), the National Historic Preservation Act (NHPA)'s rules, regulations and guidelines and should ensure disposal of federal property is done according to federal regulations for disposal of federal property. Ensure the demolition and construction debris be properly handled by licensed contractors (if needed) and disposed in licensed sanitary landfills for each type of debris.

In construction/demolition projects the DEA should address: proper handling of hazardous materials removal and disposal (asbestos, PCBs, lead from paint), and waste management (e.g., reuse or recycling as opposed to landfill dumping); wastewater management, indoor air quality, energy and water conservation (e.g., low flow toilets, energy efficient windows and doors, efficient lighting, etc.); other pollution prevention measures (e.g., use of materials with recycled content) as well as impacts to noise, traffic, air and water quality, wildlife and vegetation (could any endangered or threatened species be impacted?), erosion, sedimentation control, and impacts to historic resources.

6. The DEA and draft Finding of No Significant Impact (FNSI) should be made available for public inspection at various public locations. It would be very beneficial to ensure the public is well informed at all times through frequent public meetings, flyers, announcements and public hearings.
7. The DEA should address the needed and required permits, how to obtain them from the associated regulatory agencies and how to implement and comply with them.
8. The DEA should address land cleared or forested clear-cut harvested trees and should describe the type and age of trees present; will the trees be harvested? Concerning cumulative impacts, recently (in the near past/present/future) how many other sites and cumulative number of acres of land will or have been cleared at the facility?

9. The DEA should make sure decisions made based on archaeological surveys done in previous years are still valid.

10. The DEA should address impacts to traditional American Indian resources, if any, under the various alternatives. Consultation with the American Indian Tribes/organizations should be made and it should include a list of Tribes and or Native American Indian Organizations consulted about this project along with their responses and comments.

11. The DEA should address the Graves and Repatriation Act – (NAGPRA) to identify National Register-eligible archaeological sites; to ensure proper evaluations are carried out in order to minimize the adverse impacts to historic properties in the project areas; and so that in the event burials are located during ground-disturbing activities, the proper procedures for unexpected discoveries are followed.

12. The FEIS should discuss in some detail if there was any EJ community involvement, follow-up analyses, and/or outreach efforts performed. Also, what impact will the project have on minority businesses?

13. In addition to the noise analyses to be done related to the entire site, the DEA should also discuss what noise effects can be attributed to the temporary (state type and length of time) demolition and construction that will take place on the site.

14. The DEA should establish the contractor's procedures for borrow materials which should be according to local and state soil conservation rules and regulations to ensure the quality of the fill to be used and where the fill is borrowed from (to ensure protection of that environment).

15. If there are any reasons to expect the contractor to encounter any contaminated soils, this should be discussed in detail in the DEA and the proper studies of the site should be done along with the corrections before any work on the project is done by the contractor.

In addition, contaminated soils, solid wastes, chemicals and hazardous materials should be properly handled by licensed contractors and disposed in licensed sanitary landfills according to the type of waste; that chemicals and hazardous material be disposed of according to local, state, Federal and Clean Water Act (including RCRA and CERCLA) rules, regulations, guidelines and requirements.

16. The DEA should address handling of above ground/underground storage tanks (AST/UST), if any, according to the State and Federal rules regulations and guidelines. The DEA should address the issue of removing or not removing them and should include state and federal documentation concurring/not concurring with the final decision.

17. The DEA should address the potential for impacts from air toxics associated with the project.

18. In general, construction activities should be restricted to existing rights-of-way, if possible and best management practices should be utilized. Impacts to wetlands, floodplains, and other sensitive resources should be avoided. If avoidance is not possible, mitigation must be offered to minimize adverse impacts. If construction must run through a wetland, the area should be restored to its "natural" state. That is, the affected area should be returned to its original soil horizon as well as original contours. Also, the area should be re-vegetated with indigenous species.

If structures must be placed in a floodplain, they should be constructed to minimize the infiltration/inflow (I/I) of flood waters and should be sturdy enough to withstand the uplift and velocity forces of such waters. To minimize impacts to prime farmland and public health, water and sewer lines should not run directly through fields or obstruct the flow of water to crops. The land should be returned to its original contour and re-vegetated with indigenous plant life.

Ancillary facilities (e.g., pump stations) should be designed so not to impede the natural flow of flood waters.

Since soil disturbance associated with the demolition and construction would require disturbance to the existing site soils topography it could generate considerable amounts of storm water, erosion and environmental harm, the owner should require and monitor the contractor to apply stringent controls to minimize potential adverse impacts on wetlands, groundwater, aquifers, creeks/rivers, lakes, ponds, reservoirs, and water quality per local and state erosion and sediment rules and guidelines; the Clean Water Act; the required state and COE permits; the Executive Order 11988 - Flood Plain Management and the Executive Order 11990 - Protection of Wetlands. Runoff controls should be updated periodically for the duration of the construction (e.g., every 2-3 months) and maintained to help ensure success (e.g., silt fences emptied and hay bales replaced).

19. The DEA should include the latest cumulative impacts (past, present and future and also the total direct and indirect impacts) analysis as they affect the air quality in the area.

20. The owner should encourage the contractors to maintain and operate all construction equipment per manufacturer's specifications and recommendations to minimize air emissions. The owner should also consider offering incentives for contractors to specify the use of retrofitted diesel equipment or purchase of available ultra-low diesel fuel in their bids. The DEA should address the impact of the construction on the air quality if some of the construction could be done at night.

21. The long-term and indirect impacts of the proposed action should be considered. If the extension of service to the proposed users could cause further development of an environmentally sensitive area, alternate alignments/sites should be considered.

22. THE CONSTRUCTION INDUSTRY COMPLIANCE ASSISTANCE CENTER (CICA CENTER) cicacenter.org is your source for plain language explanations of environmental rules for the construction industry. This information is provided free of charge by the National Center for Manufacturing Sciences. Funding for this project has been provided by the U.S. Environmental Protection Agency.

23. The EPA suggests the recommendations made by **Green Building** to be followed whenever possible. **Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition.** Research and experience increasingly demonstrate that when buildings are designed and operated with their lifecycle impacts in mind, they can provide great environmental, economic, and social benefits. **Elements of Green building** include:
*Smart Growth and Sustainable Development *Energy Efficiency and Renewable Energy
*Water Stewardship *Environmentally Preferable Building Materials and Specifications *Waste Reduction *Toxics and *Indoor Environments.

1 Additional information on **Green Building** can be found at:

<http://www.epa.gov/greenbuilding/>

<http://www.greenbuilding.com/>

www.epa.gov/greenbuilding

www.greenhighways.org

<http://www.usgbc.org/>

www.greenseal.org

2 Other links

Waste Reduction Resource Center - hosted by North Carolina but it is an EPA Region 4 resource
- <http://wrrc.p2pays.org/>

Industrial materials - <http://www.epa.gov/osw/consERVE/rrr/imr/index.htm>

http://www.fema.gov/plan/prevent/fhm/dl_zone.shtm

C&D - [http://www.epa.gov/osw/consERVE/rrr/imr/cdm/
www.epa.gov/nscep/](http://www.epa.gov/osw/consERVE/rrr/imr/cdm/www.epa.gov/nscep/)

<http://www.pavementpreservation.org/toolbox/links/arrafull.pdf>

<http://www.secement.org/fdr.htm>

http://www.cement.org/pavements/pv_sc_fdr.asp

<http://www.techtransfer.berkeley.edu/newsletter/04-2/refs.php>

<http://www.youtube.com/watch?v=s7w7gsFYNzA>